

STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERALLETITIA JAMES  
ATTORNEY GENERALDIVISION OF STATE COUNSEL  
LITIGATION BUREAU

November 22, 2019

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*By ECF and Electronic Mail*

The Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

**Re: *Ali v. Ramos*, No. 16-cv-01994 (ALC)**

Dear Judge Carter:

This Office represents Court Officers Eleazar Ramos, Bruce Knowles, and Stewart Still in the above-referenced action. Pursuant to Section 1.D. of Your Honor's Individual Practices, we respectfully request a three-week extension of time to file defendants' summary-judgment motion under Fed. R. Civ. 56. This extension would affect the other scheduled dates in the so-ordered briefing schedule for the defendants' motion. (ECF No. 109.) We respectfully request that these dates also be extended three weeks with an additional three days for the reply. This is our first request for an extension of these deadlines. Plaintiff consents to this request.

In late October, we filed a letter motion requesting a pre-motion conference on an anticipated summary-judgment motion. (ECF No. 105.) By Order dated November 4, 2019, Your Honor denied our request, and set a briefing schedule for defendants' anticipated motion. (ECF No. 109.) Under this briefing schedule, the defendants' motion for summary judgment is due by December 2, 2019; Plaintiff's opposition is due by December 30, 2019; and the defendant's reply is due by January 6, 2020. (*Id.*)

We respectfully request a three-week extension of these deadlines. After submitting our pre-motion letter in late October, I was offered and have now accepted a different position in our Office outside of the Litigation Bureau. I am transitioning to this new position next Friday. Although I may stay involved in this case in an ancillary capacity subject to my new pending responsibilities, a colleague will be taking over as lead counsel and will need sufficient time to coordinate with the defendants, review the factual record, and prepare the Rule 56.1 Statement and the memorandum of law. Due to this transition of counsel, coupled with the upcoming holiday

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season, additional time is required to prepare motion papers.

For these reasons, we respectfully request, with Plaintiff's consent, a three-week extension of the deadlines set forth in this Court's November 4 briefing schedule for the defendants' summary-judgment motion, with an additional three days for the reply, making the defendants' motion due by December 23, 2019; Plaintiff's opposition due by January 20, 2020; and the defendants' reply, if any, due by January 30, 2020.

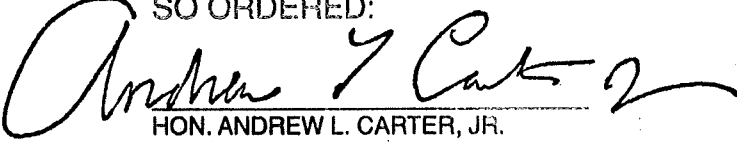
Thank you for your time and attention in this matter.

Respectfully submitted,

/s/

Jonathan D. Conley  
Assistant Attorney General

Copies to Counsel of Record (by ECF)

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
December 2, 2019